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STATE OF COLORADO

00522 RF03

DUE DATE

ACTION

Bill Owens, Governor
Douglas H. Benevento, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department
of Public Health
and Environment

June 3, 2003

Richard J. DiSalvo
Acting Assistant Manager for Environment and Stewardship
U S Department of Energy
Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, Colorado 80403-8200

RE: Approval, Industrial Area Sampling and Analysis Plan FY03 Addendum #IA-03-07, IHSS Group
500-2 (B551), April 2003

Dear Mr. DiSalvo

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) has considered the manner in which revisions will be made to the subject document. A comment resolution meeting on May 29, 2003 was successful in resolving the Division's comments, which are attached for reference. Based on this approval, please re-issue the report for verification and completion.

If you have any questions regarding this approval, please contact me at (303) 692-3367, Harlen Ainscough at 303-692-3337 or David Kruchek at 303-692-3328

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

Attachment

COR. CONTROL X X
ADMIN. RECORD X X
PATS/130

Reviewed for Addressee
Corres. Control RFP

6/9/03
Date

By

cc Norma Castaneda, DOE
Tim Rehder, EPA
Lane Butler, KH
David Shotton, KH
Mark Sattelberg, U.S.F&W
Administrative Records Building T130G

Ref Ltr #

DOE ORDER #

5400-1

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

H:\RFETS\500-2 IHSS Group SAP Addend #IA-03-07 (B551) App.doc



ADMIN RECORD
IA-A-001453

Colorado Department of Public Health and Environment

Hazardous Materials & Waste Management Division

Comments

Draft Industrial Area

Sampling and Analysis Plan

FY 03 Addendum #IA-03-07

IHSS Group 500-2

April 2003

General Comments:

1. The Division has identified apparent field and laboratory QC/QA deficiencies in respect to other IHSSs, PACs, etc. This appears to be due to references in Section 8 of the IASAP not being followed during implementation of SAP addenda. The Division will not, at this time, prescribe that specific frequencies for field QC/QA requirements be stated in SAP addenda. However, it is the obligation of the facility to ensure that "operating practice" QC/QA procedures be followed to support PARCCS requirements. Data not supported by QC/QA is not considered to be useable for decision making. In response, please specifically describe how the QC/QA requirements will be ensured by field sampling personnel and laboratory practices.
2. Relative to Comment Nos. 4, 6 and 7 below, collection of the requested samples may be delayed until the slab of Building 551 has been removed but should be incorporated into the SAP Addendum for use at that time.

Specific Comments:

3. Section 2.0, page 1, 6th para, 3rd sent - The sentence suggests, potentially, that the existing data will be used and the planned statistical sample will be omitted as a field decision. This can be avoided and clarified by adding "also" after "data" in the sentence. Previous data did not include VOC results and each biased sample must be collected.
4. Figure 3, The figure and Table 2 need to be revised to include additional samples. Page 500-1 of the HRR, June 1992, states that Building 551 was placed in service in 1953 and that the northern portion of the building was added in the mid-1960s. Page 500-7 of the HRR indicates that the release of radioactivity, the principal basis for IHSS 158, occurred in September 1959. Thus, include statistical samples beneath the northern addition of B551.
5. Furthermore, Appendix C page 55 of IASAP, June 2001, states that radionuclide contamination was found on the dock of Building 553 and that building's helium storage area. Please identify the Building 553 dock(s) and whether the helium storage area was outside Building 553. Please add bias sample locations as appropriate.
6. The IASAP indicates that leaking waste boxes were in railroad container cars north of Building 551. As the release occurred in 1959 the release may be along a rail spur under the building's northern addition. Please add biased soil samples appropriate to the extent the rail spur's location may be established.
7. If a dock existed on the north side of the original B551 structure, please identify to the extent possible, and add biased soil samples to the extent not covered by statistical sample locations.
8. Lastly, please identify the location of the Building 553 retention pond. The Division is unable to determine whether the two biased samples are appropriate or sufficient.